

Sediment TWG Feedback Form

for Draft Forest Roads Management Approach

Additional Comments Not on Form:

Page 1, second paragraph: "Forest roads built consistent with the current OAR Chapter 629, Division 623, "Forest Roads-Road Construction and Maintenance Rules" are considered protective of water quality." Page 13 of the document mentions concerns of EPA and NOAA that basically contradict this sentence, indicates that road age is not a good indicator to use, and points out that the important thing is current characteristics of the road. Therefore, we suggest deleting the sentence from page 1.

Page 2, Forest Roads Goals: "Hydrologically disconnected road network (to the maximum extent possible) using available BMPs and good design principles." We suggest adding to this goal "with minimal chronic and episodic delivery of sediment to streams."

Forest Road Objectives:

1. Working definition of the universe of roads in consideration:

- Please list any road types that have not been included and that should be?
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Similar comment as above regarding the statement in the section on Road Type #1: "'Modern FPA Roads' are built to modern BMPs which when properly built and maintained are recognized to be protective of waterways." We suggest you delete this sentence as it is not consistent with the approach as described on page 13.

Also regarding Road Type #1: "**Roads built to current standards**. These are roads which have been constructed per the standards of the major, road-related revisions to the FPA in 1984. Those revisions required full bench design and end-hauling of excavated material." This does not appear to be an accurate summary of the rules; not all roads are built using full bench design; it is only where needed to prevent landslides (and it is unclear who makes this determination, or how). This is the rule as provided by ODF to the mid-coast TMDL stakeholders:

OAR 629-625-0310 Road Prism

(2) Operators shall end-haul excess material from steep slopes or high landslide hazard locations where needed to prevent landslides.

We suggest you clarify the language regarding full bench construction and end-hauling.

I'm wondering about the last clause, "where needed to prevent landslides." ODF has done a good job of defining steep slopes and high landslide hazard locations elsewhere, but who decides whether end-hauling excess material in a specific situation actually is "needed to prevent landslides"? Does ODF have approval or enforcement authority with respect to this decision?

2. Criteria for sediment delivery potential:

- Please provide any details or clarifications suggested for the following sections in the Approach:

Criteria for sediment delivery potential	Suggestions
Risks of Chronic Sediment Delivery	
Episodic Delivery	
Common Factors	<p>Sediment Delivery Risk Factors: Not sure how stream gradient could affect the risk of sediment reaching a stream. Suggest deleting this.</p> <p>Generation of Sediment Factors: Suggest adding distance from last cross drain to where ditch enters stream at road crossing.</p>

3. Ranking according to risk:

- Are additional details (or clarifications) necessary for the ranking guidelines? If so, please list below:
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- Do you have suggestions for prioritizing project areas in which to do road work?

4. Inventory/Information/Planning:

- What type of information collection (methods, level of detail, means of processing/storage, etc.) is necessary to allow road system managers to quantify the number and type of water quality risks due to forest roads?
- Do you have suggested changes to the inventory and assessment metrics? (e.g. are there road situations that need to be included but are not listed or vice versa?)
 - Page 9, Regarding statement that “Third-party certifications such as FSC may be sufficient to meet road inventory requirements.” Suggest adding “if detail is sufficient.”
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- Please list any information on identification protocols for road risks, either additional references or protocol suggestions?
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- Please list any suggested changes for the Improvement and Removal Planning requirement.
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- Please provide any suggested elements for a Biennial Progress Report format (should convey the needed information, avoid being burdensome, be adaptable to other road sectors).
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- Timeline and Milestones:

Calendar Year	TMDL Year	Action Milestone	Suggestions
2013	0	TMDL Approved	
2015	2	Inventory & Assessment Completed; Start Road Work	
2017	4	Improvement & Removal Plan Approved	
2019	6	-	
2021	8	25% of Plan Work Completed	
2023	10	-	
2025	12	50% of Plan Work Completed	
2027	14	-	
2029	16	75% of Plan Work Completed	
2031	18	-	
2033	20	100% of Plan Work Completed	

- Should the requirements for family forestlands (private nonindustrial) be based on ownership size or operational intensity/volume, and what threshold should differentiate between industrial and nonindustrial landowners?

- What (if any) types of monitoring are not included in the Monitoring/Evaluation section but should be?

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- Do you have suggestions for or access to additional monitoring resources or suggestions for

coordination of monitoring resources?

5. Identify BMPs:

- Please provide suggestions for references in addition to those cited in the document for use in choosing suites of BMPs for the various road situations that are a risk to water quality & beneficial uses?
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- Please list any experts and practitioners that you feel would provide valuable insight for the road situation/BMP table for this TMDL.
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- Do you have suggestions for guidelines for choosing among BMPs? For example, when should transportation restrictions be used? Minor upgrades? Major upgrades? Vacation (removal of road)?
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General:

- Do the 5 objectives address the information needs for forest roads? If not, what additional questions need to be asked?
- Are there gaps in the Approach that have not been discussed in responses to the questions above and how can they be filled?
- How important do you feel it is to explore options for expanding the geographic scope to the entire Mid Coast basin?
- Please provide any additional references for assessment of forest road risks to water quality or forest road BMPs?

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